# **EXHIBIT A**

### BERNARD L. MADOFF INVESTMENT SECURITIES LLC

In Liquidation

### **DECEMBER 11, 2008**

### NOTICE OF TRUSTEE'S DETERMINATION OF CLAIM

October 19, 2009

LIRAM L.P.



Dear LI RAM L.P.:

### PLEASE READ THIS NOTICE CAREFULLY.

The liquidation of the business of BERNARD L. MADOFF INVESTMENT SECURITIES LLC ("BLMIS") is being conducted by Irving H. Picard, Trustee under the Securities Investor Protection Act, 15 U.S.C. § 78aaa et seq. ("SIPA"), pursuant to an order entered on December 15, 2008 by the United States District Court for the Southern District of New York.

The Trustee has made the following determination regarding your claim on BLMIS Account No. 1ZB067 designated as Claim Number 9323:

Your claim for securities is **DENIED**. No securities were ever purchased for your account.

Further, based on the Trustee's analysis, the amount of money you withdrew from your account at BLMIS (total of \$459,650.00), as more fully set forth in Table 1 annexed hereto and made a part hereof, is greater than the amount that was deposited with BLMIS for the purchase of securities (total of \$450,000.00). As noted, no securities were ever purchased by BLMIS for your account. Any and all profits reported to you by BLMIS on account statements were fictitious.

<sup>1</sup> Section 78111(7)(B) of SIPA states that the filing date is "the date on which an application for a protective decree is filed under 78eee(a)(3)," except where the debtor is the subject of a proceeding pending before a United States court "in which a receiver, trustee, or liquidator for such debtor has been appointed and such proceeding was commenced before the date on which such application was filed, the term 'filing date' means the date on which such proceeding was commenced." Section 78111(7)(B). Thus, even though the Application for a protective decree was filed on December 15, 2008, the Filing Date in this action is on December 11, 2008.

Since there were no profits to use either to purchase securities or to pay you any money beyond the amount that was deposited into your BLMIS account, the amount of money you received in excess of the deposits in your account (\$9,650.00) was taken from other customers and given to you. Accordingly, because you have withdrawn more than was deposited into your account, you do not have a positive "net equity" in your account and you are not entitled to an allowed claim in the BLMIS liquidation proceeding. Therefore, your claim is **DENIED** in its entirety.

Should a final and unappealable court order determine that the Trustee is incorrect in his interpretation of "net equity" and its corresponding application to the determination of customer claims, the Trustee will be bound by that order and will apply it retroactively to all previously determined customer claims in accordance with the Court's order. Nothing in this Notice of Trustee's Determination of Claim shall be construed as a waiver of any rights or claims held by you in having your customer claim re-determined in accordance with any such Court order.

Nothing in this Notice of Trustee's Determination of Claim shall be construed as a waiver of any rights or claims held by the Trustee against you.

PLEASE TAKE NOTICE: If you disagree with this determination and desire a hearing before Bankruptcy Judge Burton R. Lifland, you <u>MUST</u> file your written opposition, setting forth the grounds for your disagreement, referencing Bankruptcy Case No. 08-1789 (BRL) and attaching copies of any documents in support of your position, with the United States Bankruptcy Court and the Trustee within THIRTY DAYS after October 19, 2009, the date on which the Trustee mailed this notice.

PLEASE TAKE FURTHER NOTICE: If you do not properly and timely file a written opposition, the Trustee's determination with respect to your claim will be deemed confirmed by the Court and binding on you.

PLEASE TAKE FURTHER NOTICE: If you properly and timely file a written opposition, a hearing date for this controversy will be obtained by the Trustee and you will be notified of that hearing date. Your failure to appear personally or through counsel at such hearing will result in the Trustee's determination with respect to your claim being confirmed by the Court and binding on you.

PLEASE TAKE FURTHER NOTICE: You must mail your opposition, if any, in accordance with the above procedure, to each of the following addresses:

Clerk of the United States Bankruptcy Court for the Southern District of New York One Bowling Green New York, New York 10004

and

Irving H. Picard, Trustee c/o Baker & Hostetler LLP 45 Rockefeller Plaza

New York, New York 10111

Inving H. Picard

Trustee for the Liquidation of the Business of Bernard L. Madoff Investment Securities LLC

CC: Carole Neville, Esq.
Sonnenshein Nath & Rosenthal, LLP
1221 Avenue of the Americas, 25<sup>th</sup> Floor
New York, NY 10020

	CONTRACTOR OF THE PROPERTY OF	
DATE	TRANSACTION DESCRIPTION	AMOUNT
3/25/1993	CHECK	\$100,000.00
1/18/1994	CHECK	\$100,000.00
7/17/1995	CHECK	\$50,000.00
1/17/1997	CHECK WIRE	\$100,000.00
3/19/1999	CHECK WIRE	\$100,000.00
Total Deposits:		\$450,000,00
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	Confidence of the confidence o	
DATE	TRANSACTION DESCRIPTION	AMOUNT
10/2/1995	CBECK	(\$1,650.90)
1/2/1996	CHECK	(\$2,000.00)
4/1/1996	СИВСК	(\$2,000.00)
7/1/1996	CHECK	(\$2,900.00)
10/1/1996	CHECK	(\$2,000.00)
1/2/1997	CHECK	(\$2,000,00)
4/1/1997	CHECK	(\$4,700.00)
7/1 <b>/19</b> 97	CHECK	(\$4,700.00)
10/1/1997	CHECK	(\$4,700.00)
1/2/1998	CHECK-	(\$4,700,00)
4/1/1998	CHECK	(\$4,700.00)
7/1/1998	CHECK	(\$4,700.00)
10/1/1998		(\$4,700.00)
1/4/1999	CHÉCK	(\$4,700.00)
4/1/1909	CHECK	(\$7,200.00)
7/1/1999	CHECK	(\$7,200.00)
10/1/1999	CHECK	(\$7,200.00)
1/3/2000	CHECK	(\$7,200.00)
1/31/2000	STOP PAYMENT 1/31/00	\$7,200.00
2/1/2000	CHECK	(\$7,200.00)
4/3/2000	CHECK	(\$7,200.00)
7/3/2000	CHECK	(\$7,200.00)
10/2/2000	_	(\$7,200.00)
10/23/2000		(\$50,000.00)
1/2/2001	CHECK	(\$15,000.00)
4/2/2001		(\$15,000.00)
- <b>10/3/2</b> 003		(\$75,000.00)
10/1/2004		(\$75,000.00)
<b>10/5/2</b> 006		(\$37,590.00)
10/11/2007		(\$37,500.00)
1/2/2008		(\$17,500.00)

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10/2/2008	CHECK	(\$37,500.00)
Total Withdrawals:		(\$459,650.00)
Total deposits less withdrawals:		(\$9,650.00)

# **EXHIBIT B**



### **CUSTOMER CLAIM**

Claim Number	_
Date Received	

### BERNARD L. MADOFF INVESTMENT SECURITIES LLC

In Liquidation

RECEIVED

**DECEMBER 11, 2008** 

JUN 08 2009

Irving H. Picard, Esq.
Trustee for Bernard L. Madoff Investment Securities LLC
Claims Processing Center
2100 McKinney Ave., Suite 800
Dallas, TX 75201

Provide	your office	and nome	telephone	no.
OFFICE:	(212) 768-	6889		

Taxpayer I.D. Number (Social Security No.)

HOME:

Account Number: 1-ZB067-3

LI RAM L.P.

(If incorrect, please change)

NOTE: BEFORE COMPLETING THIS CLAIM FORM, BE SURE TO READ CAREFULLY THE ACCOMPANYING INSTRUCTION SHEET. A SEPARATE CLAIM FORM SHOULD BE FILED FOR EACH ACCOUNT AND, TO RECEIVE THE FULL PROTECTION AFFORDED UNDER SIPA, ALL CUSTOMER CLAIMS MUST BE RECEIVED BY THE TRUSTEE ON OR BEFORE March 4, 2009. CLAIMS RECEIVED AFTER THAT DATE, BUT ON OR BEFORE July 2, 2009, WILL BE SUBJECT TO DELAYED PROCESSING AND TO BEING SATISFIED ON TERMS LESS FAVORABLE TO THE CLAIMANT. PLEASE SEND YOUR CLAIM FORM BY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED.

*****		
1.	Claim for money balances as of <b>December 11, 2008_</b> : a. The Broker owes me a Credit (Cr.) Balance of	\$
	b. I owe the Broker a Debit (Dr.) Balance of	\$

	C.	If you wish to repay the Debit Balance,		
		please insert the amount you wish to rep	pay and	
		attach a check payable to "Irving H. Pica	ard, Esq.,	
	Trustee for Bernard L. Madoff Investment Securities LLC."			
		If you wish to make a payment, it must	be enclosed	
		with this claim form.	\$	
	d.	If balance is zero, insert "None."	NONE	
2				*
2.	Clairi	n for securities as of <b>December 11, 2008:</b>		g
PLEAS	SE DO N	OT CLAIM ANY SECURITIES YOU HAVE	IN YOUR POSSESS	SION.
		1	YES	NO
	a.	The Broker owes me securities		
	b.	I owe the Broker securities	***	
	C.	If yes to either, please list below:		,
				of Shares or
			Face Amou	nt of Bonds
Date of			The Broker	
Transa (trade (		Name of Security	Owes Me (Long)	the Broker (Short)
-		•	( ),	
SEE S	IAIEME	ENT DATED NOVEMBER 30, 2008		***************************************
				****
			and the same of th	**************************************

Proper documentation can speed the review, allowance and satisfaction of your claim and shorten the time required to deliver your securities and cash to you. Please enclose, if possible, copies of your last account statement and purchase or sale confirmations and checks which relate to the securities or cash you claim, and any other documentation, such as correspondence, which you believe will be of assistance in processing your claim. In particular, you should provide all documentation (such as cancelled checks, receipts from the Debtor, proof of wire transfers, etc.) of your deposits of cash or securities with the Debtor from as far back as you have documentation. You should also provide all documentation or

Pg 10 of 31

information regarding any withdrawals you have ever made or payments received from the Debtor.

Please explain any differences between the securities or cash claimed and the cash balance and securities positions on your last account statement. If, at any time, you complained in writing about the handling of your account to any person or entity or regulatory authority, and the complaint relates to the cash and/or securities that you are now seeking, please be sure to provide with your claim copies of the complaint and all related correspondence, as well as copies of any replies that you received.

PLEASE CHECK THE APPROPRIATE ANSWER FOR ITEMS 3 THROUGH 9.

NOTE: IF "YES" IS MARKED ON ANY ITEM, PROVIDE A DETAILED EXPLANATION ON A SIGNED ATTACHMENT. IF SUFFICIENT DETAILS ARE NOT PROVIDED, THIS CLAIM FORM WILL BE RETURNED FOR YOUR COMPLETION.

		YES	<u>NO</u>
3.	Has there been any change in your account since December 11, 2008? If so, please explain.	***	
4.	Are you or were you a director, officer, partner, shareholder, lender to or capital contributor of the broker?		<b>√</b>
5.	Are or were you a person who, directly or indirectly and through agreement or otherwise, exercised or had the power to exercise a controlling influence over the management or policies of the broker?		<b>√</b>
6.	Are you related to, or do you have any business venture with, any of the persons specified in "4" above, or any employee or other person associated in any way with the broker? If so, give name(s)		<b>√</b>
7.	Is this claim being filed by or on behalf of a broker or dealer or a bank? If so, provide documentation with respect to each public customer on whose behalf you are claiming.		√
8.	Have you ever given any discretionary authority to any person to execute securities transactions with or through the broker on your behalf? Give names, addresses and phone numbers.		✓

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9. Have you or any member of your family ever filed a claim under the Securities Investor Protection Act of 1970? if so, give name of that broker.

Please list the full name and address of anyone assisting you in the preparation of this claim form: Carole Neville, Sonnenschein Nath & Rosenthal LLP, 1221 Avenue of the Americas, 25<sup>th</sup> Floor, New York, NY 10020.

If you cannot compute the amount of your claim, you may file an estimated claim. In that case, please indicate your claim is an estimated claim.

IT IS A VIOLATION OF FEDERAL LAW TO FILE A FRAUDULENT CLAIM. CONVICTION CAN RESULT IN A FINE OF NOT MORE THAN \$50,000 OR IMPRISONMENT FOR NOT MORE THAN FIVE YEARS OR BOTH.

THE FOREGOING CLAIM IS TRUE AND ACCURATE TO THE BEST OF MY INFORMATION AND BELIEF. \*

Date_	6/4/09	Signature	John D.	Hobil
	· · · · · · · · · · · · · · · · · · ·	•		
Date_		Signature		

(If ownership of the account is shared, all must sign above. Give each owner's name, address, phone number, and extent of ownership on a signed separate sheet. If other than a personal account, e.g., corporate, trustee, custodian, etc., also state your capacity and authority. Please supply the trust agreement or other proof of authority.)

This customer claim form must be completed and mailed promptly, together with supporting documentation, etc. to:

Irving H. Picard, Esq.,
Trustee for Bernard L. Madoff Investment Securities LLC
Claims Processing Center
2100 McKinney Ave., Suite 800
Dallas, TX 75201

<sup>\*</sup> This form includes and incorporates in full the attached Addendum. Customer reserves the right to amend the claim for any purpose, including without limitation, to add interest, costs and other losses associated with this account.

### **ADDENDUM**

Customer:

LI RAM L.P.

Address:

Account #:

1-ZB067-3

### Document index:1

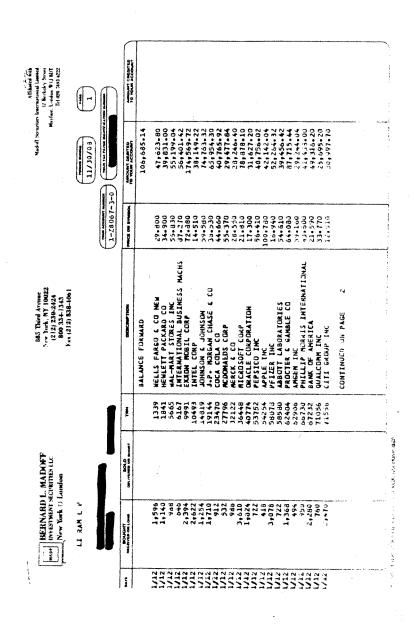
A.	Accou	nt Balance: Statement dated November 30, 2008	\$1,767,250.02	
B.	3. Investments			
	1.	Prior investment	\$242,542.58	
	2.	Portfolio Management Report dated as of 9/30/95	\$50,000.00	
	3.	Portfolio Management Report dated as of 12/31/97	\$100,000.00	
	4.	Portfolio Management Report dated as of 3/19/99	\$100,000.00	
C.	Transf	ers		
	1.	Portfolio Management Report dated as of 12/31/95	\$1,650.00	
	2.	Portfolio Management Report dated as of 12/31/97	\$16,100.00	
	3.	Portfolio Management Report dated as of 12/31/98	\$18,800.00	
	4.	Portfolio Management Report dated as of 12/31/00	\$78,800.00	
	5.	Portfolio Management Report dated as of 12/31/06	\$37,500.00	
	6.	Portfolio Management Report dated as of 12/31/07	\$37,500.00	

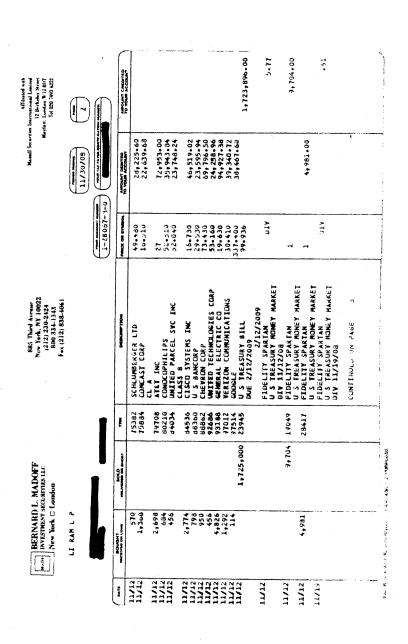
These are the only available documents for this account.

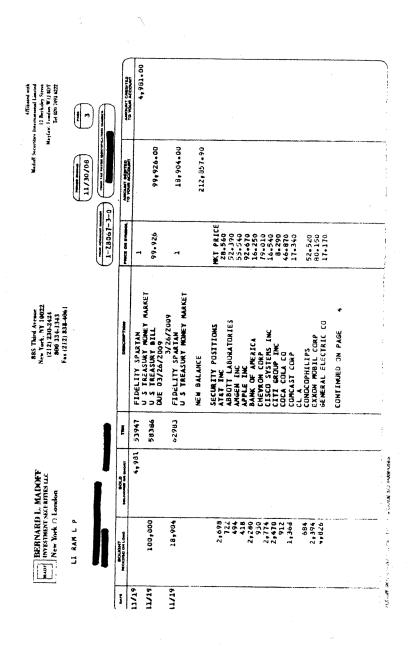
Note that certain documents containing personal information of the claimant or related parties and personal information including tax identification information have been redacted or omitted for the protection and privacy of the claimant and/or such related parties.

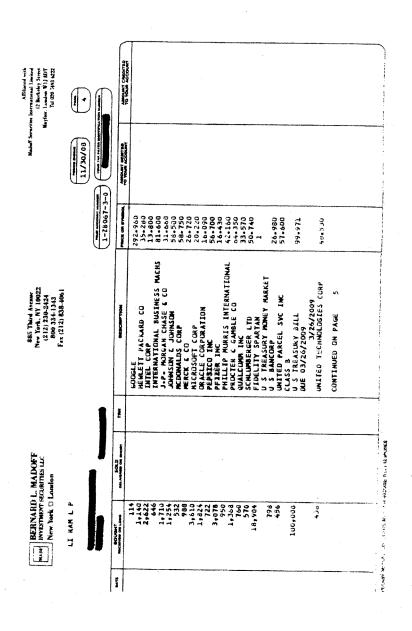
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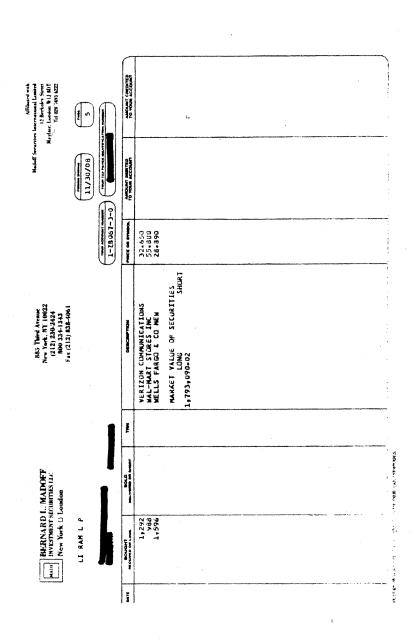
STATEMENT DATED NOVEMBER 30, 2008

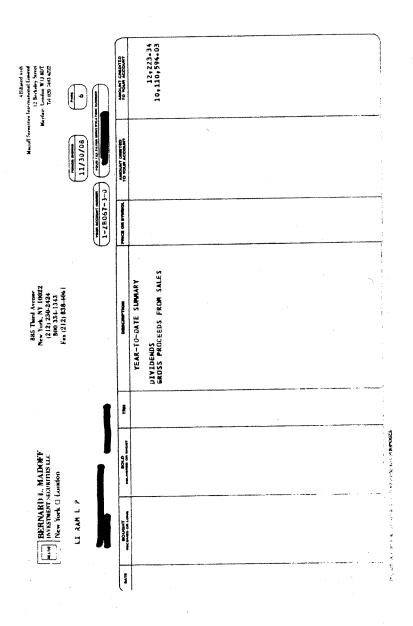


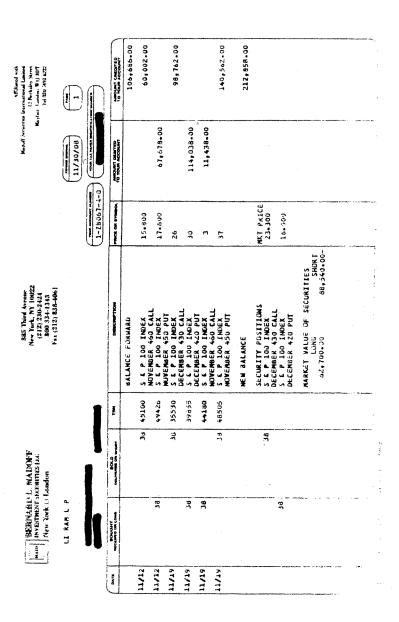












**INVESTMENTS** 

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1-78067-3

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AL ADDITIONS
AL WITHDRAWALS
ZED P/L FOR CURRENT YEAR
LIZED P/L ON OPEN SECURITY POSITIONS
NT CASH BALANCE
JARKET VALUE OF OPEN SECURITIES POSITIONS
EQUITY

LIZED RETURN FOR CURRENT YEAR 16.95 %

242,542.58CR 50,000.00CR

30,411-18CR 2,105-61CR -84CR

325,058.53 NET LONG 325,059.37CR

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1-28067-3

PORTFOLIO MANAGEMENT REPORT AS BF 12/31/97

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THIS REPORT IS PROVIDED TO ASSIST YOU IN EVALUATING THE PERFORMANCE OF YOUR ACCOUNT AND SHOULD NOT BE USED FOR INCOME TAX PURPOSES.

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CAPITAL WITHDRAWALS
REALIZED P/L FOR CURRENT YEAR
UNREALIZED P/L ON OPEN SECURITY POSITIONS
CURRENT CASH BALANCE
NET MARKET VALUE OF OPEN SECURITIES POSITIONS
TOTAL EQUITY

20.28 % ANNUALIZED RETURN FOR CURRENT YEAR

NET LONG

385,167.34CR 100,000.00CR 16,100.00-95,679.33CR

564,746.00 564,746.67CR

The property of the second of the second

901 Franklin Avenue

Garden City NY 11530

Li Ram L.P. A Lim. Partnership Attn: Mr. H. Hobish

03/18/99

As you have instructed, we have completed a Book Item Money Transfer in the amount of\$100,000.00

From: Your Account

To: Chase Manhattan Bank

For the benefit of: 140081703 Bernard L Mandoff

For the further benefit of: 1-ZB-067-3-0 LI Ram L.P.

BERNARD L. MADOFF Investment Securities
New York © London

RAM L

WE HAVE THIS GAY, EREDITED YOUR.

885 Third Avenue New York, NY 10022 (212) 230-2400 (800) 221-2242 TELEX 235 130 FAX (212) 486-8176

3/19/99

CHECK KIRE

100,000.00

CLIENT'S ACCOUNT NUMBER

1-ZB067-3

- 8

SMITH BARNEY INC.

388 GREENWICH STREET, 23RD FLOOR NEW YORK, NEW YORK 19013-2396 **TRANSFERS** 

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STARTING EQUITY FOR CURRENT YEAR
SAPITAL ADDITIONS
SAPITAL WITHDRAWALS
REALIZED P/L FOR CURRENT YEAR
UNREALIZED P/L ON OPEN SECURITY POSITIONS
SURRENT CASH BALANCE
HET MARKET YALUE OF OPEN SECURITIES POSITIONS
TOTAL EQUITY

ANNUALIZED RETURN FOR CURPENT YEAR 16.88 %

242,542.58CR 50,000.00CR 1,650.00- V 44,762.55CR

•13CR 335,655•00 NET LONG 335,655•13CR r

1-28067-3

PORTFOLIO MANAGEMENT REPORT AS OF 12/31/97

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THIS REPORT IS PROVIDED TO ASSIST YOU IN EVALUATING THE PERFORMANCE OF YOUR ACCOUNT AND SHOULD NOT BE USED FOR INCOME TAX PURPOSES.

LI RAM L P

385,167-34CR 100,000-00CR 16,100-00-95,679-33CR STARTING EQUITY FOR CURRENT YEAR CAPITAL ADDITIONS
CAPITAL WITHDRAWALS
REALIZED P/L FOR CURRENT YEAR
UNREALIZED P/L ON OPEN SECURITY POSITIONS
CURRENT CASH BALANCE
NET HARKET VALUE OF OPEN SECURITIES POSITIONS
TOTAL EQUITY

NET LONG

.67CR 564,746.00 564,746.67CR

20.28 % ANNUALIZED RETURN FOR CURRENT YEAR

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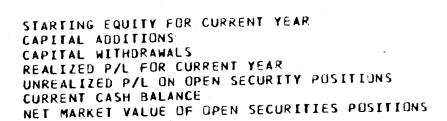
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TOTAL EQUITY

1-28067-3



ANNUALIZED RETURN FOR CURRENT YEAR 19.59 %

564,746.67CR

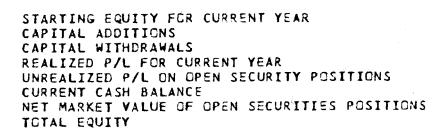
18,800.00-108,364.81CR

.48CR 654,311.00 NET LONG 654,311.48CR PORTFOLIO MANAGEMENT REPORT AS OF 12/31/00

THIS REPORT IS PROVIDED TO ASSIST YOU IN EVALUATING THE PERFORMANCE OF YOUR ACCOUNT AND SHOULD NOT BE USED FOR INCOME TAX PURPOSES.

LI RAM L P

1-ZB067-3



ANNUALIZED RETURN FOR CURRENT YEAR 13.93 %

871,625.76CR

78,800.00-117,986.15CR

.91CR 910,811.00 NET LONG 910,811.91CR (Keep for your records)

Départment of the Freasury - Internal nevenue Service

## PORTFOLIO MANAGEMENT REPORT AS OF 12/31/06

THIS REPORT IS PROVIDED TO ASSIST YOU IN EVALUATING THE PERFORMANCE OF YOUR ACCOUNT AND SHOULD NOT BE USED FOR INCOME TAX PURPOSES.

LI RAM L P

1-ZB067-3



STARTING EQUITY FOR CURRENT YEAR CAPITAL ADDITIONS CAPITAL WITHDRAWALS REALIZED P/L FOR CURRENT YEAR UNREALIZED P/L ON OPEN SECURITY POSITIONS CURRENT CASH BALANCE NET MARKET VALUE OF OPEN SECURITIES POSITIONS FOTAL EQUITY

ANNUALIZED RETURN FOR CURRENT YEAR 13.44 %

1,367,253.78CR

37,500.00-182,559.78CR

•56CR 1,512,313•00 NET LONG 1,512,313•56CR

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# PORTFOLIO MANAGEMENT REPORT AS OF 12/31/07

THIS REPORT IS PROVIDED TO ASSIST YOU IN EVALUATING THE PERFORMANC ACCOUNT AND SHOULD NOT BE USED FOR INCOME TAX PURPOSES.

1,649,627.50 1,649,627.72,1B 37,500.00. 1,512,313.56 1-28067-3 NET MARKET VALUE OF OPEN SECURITIES POSITIONS REALIZED P/L FOR CURRENT YEAR UNREALIZED P/L ON OPEN SECURITY POSITIONS STARTING EQUITY FOR CURRENT YEAR CURRENT CASH BALANCE CAPITAL WITHDRAWALS CAPITAL ADDITIONS TCTAL EQUITY LI RAM L

ANNUALIZED RETURN FOR CURRENT YEAR 11.62 %